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Attorneys for Defendant
NISSAN NORTH AMERICA, INC.,

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SALVADOR MEDINA, an individual,

Plaintiff,

vs.

NISSAN NORTH AMERICA, INC., a
Delaware Corporation; EMPIRE
NISSAN OF SANTA ROSA LLC dba
JIM BONE NISSAN OF SANTA
ROSA, and DOES 1 through 10,
inclusive,

Defendants

Case No. 4:23-cv-02090-HSG

Date: November 30, 2023
Time: 2:00 p.m.

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO SUBMIT
REPLY BRIEF IN SUPPORT OF
MOTION TO COMPEL
ARBITRATION**

Complaint filed: April 28, 2023
Trial Date: November 18, 2024

1 Plaintiff Salvador Medina, Defendant Nissan North America, Inc. (“NNA”),
2 and Defendant Empire Nissan of Santa Rosa LLC dba Jim Bone Nissan of Santa Rosa
3 (“Jim Bone”), (collectively “the Parties”), by and through their respective counsel of
4 record, hereby stipulate as follows:

5 WHEREAS, on September 6, 2023, Jim Bone filed a Motion to Compel
6 Arbitration (Dkt. 32–Dkt. 38),

7 WHEREAS, on September 8, 2023, Jim Bone re-filed its Motion to Compel
8 Arbitration, which is the operative motion that is the subject of this Stipulation and
9 Order (Dkt. 41),

10 WHEREAS, on September 19, 2023, NNA filed a Notice of Joinder to Jim
11 Bone’s Motion to Compel Arbitration (Dkt. 42), which requests that the Court order
12 all of Plaintiff’s claims to arbitration according to the sales contract and stay the action
13 pending resolution of arbitration,

14 WHEREAS, on September 22, 2023, Plaintiff filed his Opposition to the
15 Motion to Compel Arbitration (Dkt. 43),

16 WHEREAS, in light of the arguments Plaintiff raised in opposition to the
17 Motion to Compel Arbitration pertaining, NNA will be filing its own Reply brief,

18 WHEREAS on September 27, 2023, counsel for Plaintiff and NNA met and
19 conferred in an attempt to resolve the issues raised by Plaintiff’s opposition without
20 requiring judicial involvement,

21 WHEREAS, the Parties have agreed that NNA’s last day to submit its own
22 Reply brief should be extended to October 13, 2023,

23 WHEREAS, the requested extension will not affect the current hearing date for
24 the Motion or any other deadlines set by the Court.

1 NOW, THEREFORE, IT IS HEREBY AGREED AND STIPULATED by and
2 between the Parties, through their respective counsel, that:

3 1. NNA's Reply brief in support of the Motion to Compel Arbitration shall
4 be due no later than October 13, 2023.

5
6 Dated: September 28, 2023

PRESTIGE LEGAL SOLUTIONS, P.C.

7 By: /s/ Sarah Pfeffer
8 Sarah Pfeffer

9 Attorneys for Plaintiff
10 SALVADOR MEDINA

11 Dated: September 28, 2023

SIDRAN LAW CORP

12 By: /s/ David R. Sidran
13 David R. Sidran

14 Attorneys for Defendant
15 EMPIRE NISSAN OF SANTA ROSA,
16 LLC dba JIM BONE NISSAN OF SANTA
17 ROSA

18
19 Dated: September 28, 2023

SHOOK HARDY & BACON L.L.P.

20 By: /s/Naoki S. Kaneko
21 Naoki S. Kaneko

22 Attorneys for Defendant
23 NISSAN NORTH AMERICA, INC.

24 IT IS SO ORDERED.

25
26 Dated: 9/29/2023

27 
28 HONORABLE HAYWOOD S. GILLIAM, JR.